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U. S. Nuclear Regulatory Commission
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Washington, DC 20555

ATTN: Mr. Jose A. Calvo, Director
Project Directorate IV
Division of Reactor Projects -
III, IV, V and Special Projects

SUBJECT: Arkansas Nuclear One - Unit 2
Docket No. 50-368
License No. NPF-6
CRDR Implementation Schedule Revision

Dear Mr. Calvo:

The purpose of this letter is to inform you of a revision to the implementation schedules for the resolution of certain Control Room Design Review (CRDR) Human Engineering Discrepancies (HEDs). This was discussed by telephone with the NRC ANO-2 Project Manager and CRDR reviewer and members of our staff on January 22, 1988. The original schedules for HED resolution were provided in the ANO-2 CRDR Final Summary Report, transmitted by letter dated May 5, 1986 (2CAN058601).

Resolutions for four HEDs (006, 419, 420 and 421, all related to providing additional RCS makeup capability in the unlikely event of a loss of all AC power) are being deferred until the Station Blackout Rule and related guidance documents are issued by the NRC. These HEDs resulted from a beyond-design-basis contingency included in the ANO-2 Emergency Operating Procedure. AP&L has completed engineering evaluation of the alternatives for resolution of these HEDs as described in the Final Summary Report, but our position is that it would not be prudent to proceed without considering the regulatory requirements to be issued shortly. The results of our efforts to date to resolve these HEDs will be factored into any additional modifications which may result from issuance of the Station Blackout Final Rule. Necessary modifications will be implemented in accordance with the Station Blackout Rule schedule requirements.

Some hardware modifications to address HED 040, related to emergency diesel generator exhaust fumes being present in the control room ventilation intake, may not be completed until 2R7. The resolution originally planned, as described in the Final Summary Report, involved modifications to the fresh air intake damper controls. Further engineering evaluation has determined that a better

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solution may involve relocation of the fresh air intake from the turbine building roof to inside the turbine building. Also, work related to the control room habitability issue is scheduled to be performed during 2R6, which will allow for more detailed scoping of the resolution of this HED.

The NRC guidance was for safety significant (Category 1) HEDs to be resolved by the completion of the second refueling outage following submittal of the CRDR Final Summary Report. For ANO-2, this would be 2R7, which is estimated to occur in late 1989. Assuming the Station Blackout Rule will be resolved soon and extensive modifications will not be necessary, the schedule changes identified above are consistent with the existing NRC guidance for schedules for resolving safety significant HEDs. The remaining safety significant HEDs are being implemented in accordance with the schedules submitted in the Final Summary Report. It should be noted that only Category 1 HEDs are required to have schedules for resolution and/or implementation of corrective actions.

The Technical Evaluation Reports (TERs) for the ANO-1 and 2 CRDR Program were transmitted by letter dated October 24, 1986 (ØCNA1Ø8616). The ANO-2 TER requested additional justification regarding the schedule for resolution of certain HEDs related to the annunciator/alarm upgrade program, although the program and schedule are the same for ANO-1. This apparent inconsistency was also discussed in the above mentioned phone call with your staff, and we are providing the following information regarding this issue.

The AP&L CRDR Program identified a total of 31 Category 1 HEDs. Of the 31 subject HEDs, four (12.9%) may require correction/resolution schedules which extend beyond the second refueling outage (2R7) after completion of the CRDR review process. These four HEDs (056, 060, 107 and 111) are to be resolved by the comprehensive annunciator/alarm upgrade program. The effort is described in Section 8.2.3 of Volume 1 of the Final Summary Report. This program is currently underway and proceeding on schedule with implementation of modifications scheduled to start on three annunciator panels during 2R7. Because of the scope and the meticulous care essential for such a program, design and evaluation efforts will be accomplished in time to support carefully planned, phased installation of improvements during refueling outages 2R7, 2R8, and 2R9. This schedule will address/implement corrective action on approximately one-third of the annunciator boxes during each of the aforementioned outages. Therefore, portions of these four HEDs are scheduled to be addressed by 2R7, and a significant portion of this effort will be accomplished during 2R8, with completion scheduled during 2R9. The program and schedule for the ANO-2 annunciator upgrade project is identical to that underway for ANO-1. Similar justification was provided in the Final Summary Reports and in meetings with the NRC staff, and a similar schedule was approved for ANO-1 in the CRDR TER transmittal letter.

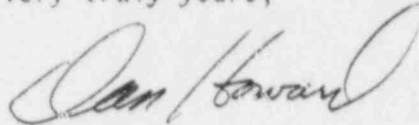
Of the 31 subject HEDs, 12 HEDs (38.7%) have already been resolved/corrected. Six of these HEDs were identified as corrected or resolved in the Final Summary Report. These six are 002, 005, 007, 408, 601, and 603. Five HEDs were corrected during 2R5. These five are 049, 050, 052, 133 and 604. These HEDs were addressed as discussed in Volume 2 of the Final Summary Report. HED 038 was assessed as requiring no corrective action on ANO-2, as it is the same as ANO-1 HED QS:A5.2-1.065. It was determined that noise in the ANO-2 control room due to control room emergency ventilation unit VSF-9, which is located above the ANO-1 control room, does not significantly affect ANO-2.

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Of the 31 subject HEDs, 15 HEDs (48.4%) are scheduled for correction during the next two refueling outages, 2R6 and 2R7. Schedules for these 15 HEDs have been identified in the Final Summary Report and above, including the safety significant HEDs scheduled for correction during 2R7 which have been deferred from 2R6.

AP&L believes that the information presented above demonstrates our aggressive approach to the identification and resolution of HEDs under the AP&L CRDR program. The annunciator upgrade program, which requires a careful, deliberate effort, involves only a few Category 1 HEDs; the rest will be completed within the two refueling outage time frame promulgated by the NRC.

Very truly yours,



Dan R. Howard
Manager, Licensing

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